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5 Attorneys for Plaintiff
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8 **IN THE UNITED STATES DISTRICT COURT**
9
EASTERN DISTRICT OF CALIFORNIA

10
11 **MONIQUE R. KANE**

)

Case No. 14-2419 CKD

12)
13)
14 Plaintiff,)
15 v.)
16)

**STIPULATION AND PROPOSED
ORDER EXTENDING PLAINTIFF'S
TIME TO FILE SUMMARY
JUDGMENT MOTION**

17)
18 **CAROLYN W. COLVIN,**
19 **ACTING COMMISSIONER OF SSA**
18 _____)

Defendant.

20 IT IS HEREBY STIPULATED by and between the parties, through their attorneys, that
21 Plaintiff's time to file her summary judgment motion is hereby extended from April 10, 2015, to April
22 20, 2015, with all other deadlines extended accordingly. This extension is required due to counsel's
23 failure to re calendar the due date for Ms. Kane's summary judgment motion. (See declaration.)

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1 I , Bess M. Brewer, Declare:

2 1. I am an attorney licensed the practice law in California and am admitted
3 to practice before this Court. I represent the plaintiff in the above
4 referenced case.

5 2. Plaintiff's motion for summary judgment was extended to April 10,
6 2015, unfortunately, I failed to re calender the new due date. I just
7 became aware of the oversight today.

8 3. I apologize to the Court for my failure to file Ms. Kanes' summary
9 judgment motion on time.

10 I declare under the penalty of perjury that the foregoing is true and correct to the best of my
11 knowledge, and that this declaration was executed on April 14, 2015. In Sacramento, California.

12 /s/ Bess M. Brewer

13 BESS M. BREWER

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16 Dated: April 14, 2015

/s/Bess M. Brewer

BESS M. BREWER
Attorney at Law

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Attorney for Plaintiff

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Dated: April 14, 2015

Benjamin B. Wagner
United States Attorney

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Donna L. Calvert
Regional Chief Counsel, Region IX
Social Security Administration

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/s/Ann Lucille Maley
ANN LUCILLE MALEY
Special Assistant United States Attorney
Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED.

3 Dated: April 16, 2015

Carolyn K. Delaney

CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE